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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**



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**Ref:
AMMON EDWARD BUNDY**

**Case No.: 24-23530
Chapter 7
William T. Thurman**

**Adversary Proceeding
No.: 24-02130**

**DEFENDANT AMMON BUNDY'S RESPONSE TO DECLARATION OF ERIK F.
STIDHAM IN SUPPORT OF PLAINTIFFS' REPLY**

Comes now Defendant **Ammon Edward Bundy** respectfully submits the following response to the Declaration of **Erik F. Stidham**, dated June 23, 2025, in support of Plaintiffs' Reply in Further Support of Motion for Summary Judgment. Mr. Stidham's declaration contains multiple misrepresentations and improper assertions that the Court should consider.

1. Misleading Use of Biased News Article as "Evidence"

Mr. Stidham opens his declaration by attaching a news article from the *Idaho Statesman* titled "*Fact check: Ammon Bundy used edited video to falsely accuse St. Luke's doctor of lying.*" This article is neither factual evidence nor admissible under any evidentiary rule. It is an editorial piece—written by journalists without firsthand knowledge—meant to shape public opinion, not inform the Court.

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The video referenced by the news outlet was not “edited” by Ammon Bundy in the sense of being altered, manipulated, or doctored. It was simply a clip from a nearly hour-long unedited bodycam recording, which remains available in full. The label “edited” was misused by the *Idaho Statesman* to suggest deliberate deception, which is false.

Indeed, the *Idaho Statesman* has shown a sustained pattern of bias against Mr. Bundy, particularly during the years 2020 through 2023 when he was the most covered and most criticized political figure in Idaho. During Mr. Bundy’s campaign for Governor, the *Statesman* regularly ran stories that portrayed him in a negative light, often echoing defamatory rhetoric and allegations aligned with his political opponents—including Plaintiffs in this case. Their inclusion here as “evidence” is not only improper, but a revealing indicator of Plaintiffs’ strategy: to inject media bias and political hostility into a legal proceeding where only facts and law should govern.

The use of this article serves no purpose other than to inflame the Court against Mr. Bundy and obscure the real evidentiary issues at hand—namely, that it was Plaintiffs’ legal team who submitted misleading and selectively clipped videos during trial, not Mr. Bundy.

2. False and Misleading Representations Regarding Trial Exhibit 174

In Paragraph 6 of his declaration, Mr. Stidham claims that “Exhibit B is a true and correct copy of a video exhibit from the 2022 Lawsuit, Trial Exhibit 174,” and that it was “appropriately admitted at trial” to show what was “published to the jury.” He further asserts that this proves Mr. Bundy is “wrong in his assertion that video evidence was misleadingly edited and withheld from the jury” This is simply not true.

While it is accurate that the original video—referred to as Trial Exhibit 174—was entered into evidence, the full and unaltered video was not shown to the jury. Instead, what the jury saw was an altered version composed of **two strategically spliced clips** from the

original video. These were edited and combined to form **a single presentation**, stripped of key context, and shown in a way that misrepresented what Mr. Bundy actually said.

This spliced version was presented to the jury by Plaintiffs through the testimony of St. Luke's CEO Chris Roth. **It was not introduced as a compilation or identified as edited.** Rather, the altered video was shown as a continuous segment, without disclosing that critical portions—including Mr. Bundy's repeated statements calling for peace, lawful conduct, and nonviolence—were deliberately removed. The effect was to create a misleading portrayal of Mr. Bundy's message, making it appear as though he was inciting unlawful behavior when the opposite is true.

The jury was therefore never exposed to Mr. Bundy's actual message in full. The original YouTube based video—Trial Exhibit 174—was never played or published in its entirety. Plaintiffs misled the jury by omitting the full version and instead offering a distorted version through curated snippets.

Moreover, Mr. Stidham's assertion that the video is not hearsay because it is used only to "demonstrate what was published to the jury" fails to address the heart of the matter: the jury was shown **an altered version, not the full exhibit or a single clip**. The implication that the video defeats Mr. Bundy's objection is therefore itself based on a false premise.

This was not a minor omission—it was a calculated act of evidentiary manipulation. **Presenting two edited clips as one continuous video**—while withholding the full original—distorted the meaning of Mr. Bundy's statements and materially misled the jury on the core issue of intent. Mr. Stidham's declaration conceals this fact and should be rejected in its entirety.

3. Failure to Attach or Serve Referenced Exhibits

Mr. Stidham's declaration repeatedly references multiple exhibits—including Exhibits B, C, D, and E—which he claims support Plaintiffs' position in this matter. However, none

of these exhibits were attached to the declaration as filed, nor were they served upon Mr. Bundy in connection with this proceeding.

This failure to attach and disclose the evidence relied upon deprives Mr. Bundy of the opportunity to meaningfully evaluate or respond to the material. Under Federal Rule of Civil Procedure 56(c), parties must support factual contentions with admissible materials and must make those materials available to the opposing party. Reliance on unserved or unfiled exhibits in a motion for summary judgment is procedurally improper and fundamentally unfair.

Accordingly, the Court should deny summary judgment until full disclosure and service is made.

4. Request for Evidentiary Hearing to Resolve Dispute over Video Evidence

In his opposition to Plaintiffs' Motion for Summary Judgment, Mr. Bundy raised the fact that Plaintiffs presented an altered and misleading version of a public video at trial—one that was strategically altered to omit key statements urging peace and lawful conduct. This was offered as a reason why summary judgment should be denied: because Plaintiffs' claims of willful and malicious conduct were built, in part, on manipulated evidence.

In response, Plaintiffs—through Mr. Stidham's declaration—now assert that the full, original video (Trial Exhibit 174) was presented to the jury, and that the clip shown was merely representative. These claims are false. The full original video was not shown. Instead, **Plaintiffs presented two carefully spliced excerpts edited together to portray a different and misleading narrative.** This edited compilation was shown to the jury without disclosing that it was not the full video, and without including Mr. Bundy's explicit disclaimers discouraging violence and calling for peaceful action.

Given this direct and material factual dispute, Mr. Bundy respectfully requests that the Court set an evidentiary hearing for the limited purpose of resolving the truth about what video was actually presented to the jury and how it was edited. This hearing is necessary

to prevent Plaintiffs from securing summary judgment based on a mischaracterization of the trial record and a misrepresentation of what the jury actually saw.

Until this factual issue is resolved through direct evidentiary review of the original video, the trial presentation, and relevant trial transcripts, summary judgment is premature and should be denied.

Respectfully submitted,

Dated: July 08, 2025

A handwritten signature in cursive script, appearing to read "A. Bundy", written in dark ink.

Ammon E. Bundy

I certify that on this day I served a copy of the attached to:

UNITED STATES BANKRUPTCY COURT, DISTRICT OF UTAH

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Erik Stidham

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DATED THIS DAY, the 8th of July, 2025.

A handwritten signature in black ink, appearing to read "Ammon Bundy", with a large, stylized initial "A".

Ammon Bundy